Status of Previous Issues

On April 21, 2003, the staff of the U.S. Nuclear Regulatory Commission (NRC) issued a Commission paper (SECY-03-0062), entitled "Reactor Oversight Process Self-Assessment for Calendar Year 2002." That Commission paper listed and discussed the status of previous issues related to implementation of the Reactor Oversight Process (ROP) for which the staff planned additional actions. SECY-03-0062 also discussed commitments and actions that the staff had planned as a result of the ROP self-assessment for calendar year (CY) 2002. The Commission also directed the staff to consider additional issues as detailed in several staff requirements memoranda (SRMs). The Davis-Besse Lessons Learned Task Force (DBLLTF), Office of the Inspector General (OIG), Efficiency Focus Group, Advisory Committee on Reactor Safeguards (ACRS), Significance Determination Process (SDP) Task Group, and other interested stakeholders have also recommended improvements to the ROP program.

During the last self-assessment period (CY 2003), the staff resolved many of these issues and made progress toward resolving several others. The remainder of this attachment lists and summarizes the status of the issues in each program area that were discussed in the aforementioned documents, including an update of the staff's actions to address those issues. Those issues that were closed during CY 2003 are so noted and will not be carried forward into next year's self-assessment. The respective program area assessments in Attachment 1 to this paper provide additional detail concerning the more significant issues listed below.

Performance Indicator Program

(1) *Improvements to address problems in the Safety System Unavailability (SSU) Performance Indicator (PI)*

In March 2003, the staff completed a pilot of the Mitigating Systems Performance Index (MSPI), which was developed as a replacement for the Safety System Unavailability PI, and the staff's evaluation of the data revealed a number of issues that needed further work. Although the pilot and evaluation efforts resulted in an MSPI that had certain advantages over the SSU PI, the disadvantages and unintended consequences were deemed significant and outweighed the potential improvements. The staff therefore recently announced that use of the MSPI in the ROP, as currently proposed, would not be pursued further. Further information on MSPI is included in Attachment 1. In addition, the effort on MSPI has impacted other PI work, as noted below.

(2) *Potential unintended consequences of the Unplanned Power Change PI*

Some stakeholders believe that the current Unplanned Power Change PI could influence licensees to operate the plant in a manner that is inconsistent with safety. Specifically, there are concerns with the requirements that the power change must exceed 20 percent and that licensees must allow 72 hours for planning the power change. The staff is investigating several alternatives to the current PI, and has presented those alternatives to stakeholders in the regularly scheduled public meetings. However, resolution of the issue has been delayed as a result of competing priorities (see above).

(3) *Develop improved Barrier Integrity cornerstone PIs*

The DBLLTF (reference item 3.3.3.3) recommended that the NRC should continue its ongoing efforts to review and improve the usefulness of the barrier integrity PIs. The first phase of this program calls for the staff to develop and implement improved barrier integrity indicators based on current requirements and measurements. As a result of its review, the staff is considering the following potential improvements:

- Fuel Clad: Reactor coolant system (RCS) activity could be replaced by the Fuel Reliability indicator proposed by the World Association of Nuclear Operators (WANO).
- Primary Coolant System (PCS): With the exception of pressure boundary leakage (which has a threshold of zero), all leakage measurements required by the technical specifications (TS) could be monitored by the PCS PI and compared (in some way) to the allowable TS limit. All parameters could then be displayed and the PI color could be determined by the one closest to its limit.
- Containment leakage: The containment leakage PI, which was deleted from the ROP following the pilot program in 1999, could be reinstated.

The staff is continuing its work to document these approaches in the form of PI definitions.

(4) *Physical Protection cornerstone PI issues*

The staff and industry recognize the need to improve the physical protection PIs. These efforts were put on hold as a result of competing priorities, which arose in the wake of the terrorist attacks on September 11, 2001. The staff will evaluate these efforts as part of the ongoing security review being conducted by the NRC's Office of Nuclear Safety and Incident Response (NSIR), in coordination with the NRC's Office of Nuclear Reactor Regulation (NRR). The staff plans to review and revise the Physical Protection PIs in CY 2004.

(5) *Emergency Preparedness cornerstone PI issues*

The staff discovered that the Alert and Notification System (ANS) PI may remain within the licensee response band, indicating greater than 94-percent reliability, even if the sirens are available less than 94 percent of the time. The staff evaluated this issue and determined that availability is best monitored by inspection. Accordingly, the staff has incorporated ANS availability into the inspection program, rather than into the ANS PI. Therefore, this issue is closed.

(6) *Clarify the guidance for the Safety System Functional Failure (SSFF) PI*

The staff discovered that the number of SSFFs that licensees reported for the ROP was 20 percent lower than the number identified by the NRC's contractors at the Idaho National Engineering and Environmental Laboratory (INEEL) using licensee event reports (LERs). Resolution of the issue was delayed as a result of competing priorities (see above); however, investigation into this discrepancy resumed in early 2004.

(7) *Review ACRS recommendations concerning the white/yellow and yellow/red thresholds for performance indicators (PIs)*

In an SRM dated December 20, 2001 (M011205B), the Commission asked the staff to review ACRS recommendations concerning the white/yellow and yellow/red thresholds for PIs, particularly with regard to implementation of risk-based PIs. The staff has met and corresponded with the ACRS and acknowledges their concern. However, each of these thresholds has an established basis, and any proposed changes will require careful evaluation, as noted in the staff's responses to the ACRS. (See Accession Numbers ML023610493 and ML030980658 for the official record copies of those responses in the NRC's Agencywide Documents Access and Management System (ADAMS)).

The staff plans to conduct a thorough review and evaluation of the PI program, including the individual indicators, their thresholds, and the possible need for additional indicators, during the fifth year of ROP implementation. This review will consider the ACRS comments regarding the PI thresholds.

(8) *Continue to work closely with INPO on the Consolidated Data Entry (CDE) program to develop a single database for the reporting of necessary data*

The primary goal of the CDE program is to consolidate the collection and reporting processes for all data required by the NRC, WANO, and the Institute of Nuclear Power Operations (INPO). The staff has discussed and reviewed the CDE program with INPO, and found that it appears to accurately capture the data that the staff needs for the ROP. The staff supported the recent shift in responsibility for PI collection and maintenance from NEI to INPO as part of the CDE program. The first set of PI data submittals under the CDE program were for the 4th quarter 2003 data, and all submittals were received and processed successfully in January 2004. This issue is considered closed.

(9) *PIs are needed for the cross-cutting issues, and their development should be pursued by the staff*

The ACRS and other stakeholders have expressed the need for PIs for the cross-cutting areas of problem identification and resolution (PI&R), human performance, and safety-conscious work environment. The staff will consider PIs for the cross-cutting issues as part of its review of the PI program during the fifth year of the ROP (see item 7 above).

Inspection Program

(1) *Continue to evaluate and revise as necessary the guidance for documenting inspection findings to ensure that significance thresholds are consistently applied*

The staff revised and issued Inspection Manual Chapter (IMC) 0612, "Power Reactor Inspection Reports," on April 29, 2002. After a brief training period, all regions implemented the new requirements of IMC 0612 in July 2002. The staff also reissued IMC 0612 on June 24, 2003, to include a sample inspection report and to improve the clarity of the documentation guidance. In addition, the revision addressed inconsistencies that existed between IMC 0612 and other inspection program

documents, including the enforcement policy. The staff began auditing inspection reports against the requirements of the revised IMC 0612 in CY 2003. Specifically, to obtain the metric data, the staff reviewed 99 inspection reports from all four regions, which documented a total of 254 findings. That review revealed that the percentage of findings documented in accordance with the requirements of IMC 0612 increased from 67.7 percent in the first quarter of 2003 to 88.9 percent in the fourth quarter, indicating an improving trend. Therefore, this issue is closed.

(2) *Revise the Physical Protection cornerstone inspection procedure and its attachments to account for significant changes and new polices in physical security*

As a result of the terrorist attacks on September 11, 2001, the staff issued Temporary Instruction (TI) 2515/148, "Inspection of Nuclear Reactor Safeguards Interim Compensatory Measures." The staff also informed the Commission in SECY-02-0195, "Staff Plans to use Temporary Instruction for Verification of Licensee Implementation of Power Reactor Security Interim Compensatory Measures and as Temporary Replacement of the Physical Protection Baseline Inspection Program," dated November 1, 2002, that the inspections conducted pursuant to TI 2515/148 were sufficiently scoped to satisfy portions of the baseline inspection program for the physical protection cornerstone in CY 2002 and CY 2003. This was in conjunction with completion of portions of the ROP baseline inspection procedures and conduct of the physical protection cornerstone portion of the Performance Indicator Verification procedure.

The staff also issued IMC 2201, "Security and Safeguards Inspection Program for Commercial Reactors," to establish interim policy and guidance for the security and safeguards inspection of commercial power reactors. In addition, the staff revised and issued baseline inspection procedure 71130 and its attachments for verification and assessment of licensees' actions with respect to (1) safeguards events; (2) recurring, non-routine safeguards activities; and (3) Commission initiatives that are deemed necessary to address adequacy in the protection of public health and safety from the design-basis threat or changes thereto. Accordingly, this issue is closed.

(3) *Evaluate how licensee self-assessments might be used to satisfy some requirements of the baseline inspection program without compromising overall outcome goals, including public confidence*

As part of its ongoing efforts to improve the effectiveness and efficiency of the ROP, the NRC is currently evaluating a process that would allow licensees to receive credit for certain self-assessments. Specifically, the NRC is considering allowing licensees to substitute self-assessments for specific, predetermined NRC baseline inspections, as long as the self-assessments are conducted in accordance with an NRC-approved industry self-assessment process. The NRC would still monitor these self-assessments, but the staff anticipates that resource savings to the NRC and its licensees could be significant for these inspectable areas. The staff will conduct a pilot program, which is likely to begin in 2004, to ascertain the feasibility of the licensee self-assessment process. The staff will report the status of the pilot program in the next annual ROP self-assessment.

(4) *Ensure the adequacy of site staffing and modify policy as necessary*

In an SRM dated February 12, 2003 (M030204), the Commission requested the staff to inform the Commission when emergent or other issues significantly impede their ability to carry out their mission or a regional office requires significant resources from another region or office. Further, in an SRM dated June 10, 2003 (M030515), the Commission directed the staff to inform the Commission of significant regional ROP inspection challenges, including sites where there are currently less than two fully qualified inspectors assigned. The staff responded to the Commission in a memorandum dated October 16, 2003, regarding information on site staffing and the resource challenges and coping measures in completing the inspection program for CY 2003.

Additionally, the staff changed the resident inspector policy to allow early assignment of new resident and senior resident inspectors to a site. The new policy allows the regional administrator to assign a permanent resident inspector up to 12 months before the planned departure of the incumbent resident inspector, or to assign a permanent senior resident inspector up to 6 months before the planned departure of the incumbent senior resident inspector. This early reassignment policy should help the regions minimize the length of time during which the sites are not fully staffed.

In 2003, NRR and two regional offices made significant resource contributions to assist two other regions in successfully completing the baseline inspection program. The assistance provided by NRR and regional staff impacted their ability to complete some project work as scheduled, and there were delays in some personnel transfers and qualifications. The staff evaluated the inspection resource needs in each of the four regions to address challenges in future years. As a result, the regional budget for operating reactor inspection activities in fiscal years (FYs) 2004 through 2006 was increased by 15 full time equivalent (FTE) positions (compared to the FY 2003 budget). The additional regional FTEs should alleviate resource challenges once individuals occupying these positions become fully qualified inspectors.

Also, in an SRM dated February 14, 2003 (M030210), the Commission asked the staff to include in the next update of resident inspector demographic data (included in the annual ROP self-assessment) information on the number and duration of gaps in resident inspector assignments resulting from personnel changes and the staff actions taken to provide interim support. The staff has developed a draft metric and is currently gathering data to establish a baseline for monitoring resident inspector staffing/gaps as part of the staff's review of Davis-Besse lessons learned recommendations. The staff will report to the Commission on progress in this area in the next annual ROP self-assessment paper.

(5) *Review the current baseline inspection procedures for potential consolidation*

The Efficiency Focus Group recommended that the staff should review the baseline inspection procedures to identify areas where consolidation is possible. The staff has initially undertaken this suggestion for four groups of baseline inspection procedures, and is currently implementing the consolidated procedures in a pilot inspection program at selected sites in each region. The staff will provide the results at the conclusion of the pilot inspections. If the anticipated resource savings are realized, and assuming that effectiveness is maintained, the staff may extend the consolidation to other baseline procedures.

(6) *Establish guidance to ensure that generic requirements or guidance are not inappropriately affected when making unrelated changes to processes*

The DBLLTF (reference item 3.1.2.3) recommended that the NRC should establish process guidance to ensure that generic requirements or guidance are not inappropriately affected when making unrelated changes to processes, guidance, etc. (e.g., deleting inspection procedures that were developed in response to a generic issue). As a result, the staff revised IMC 0040, "Preparing, Revising, and Issuing Documents for the NRC Inspection Manual," to require that the staff must perform a review to ensure that revisions of inspection procedures do not inadvertently delete inspection requirements that were added as a result of an event or occurrence that has continuing generic applicability. Accordingly, this item is closed.

(7) *Develop inspection guidance pertaining to reactor coolant system unidentified leakage*

The DBLLTF (reference item 3.2.1.2) recommended that the NRC should develop inspection guidance pertaining to unidentified RCS leakage, and should include action levels to trigger increasing levels of NRC interaction with licensees in order to assess the licensees' actions in response to increasing levels of unidentified RCS leakage. In addition, the action level criteria should identify adverse trends in unidentified RCS leakage that could indicate degradation of the reactor coolant pressure boundary (RCPB). The staff is presently evaluating the inspection guidance pertaining to unidentified RCS leakage, and expects to complete this review by December 2004.

(8) *Ensure that licensee procedures provide adequate guidance for the identification of reactor coolant pressure boundary leakage*

The DBLLTF (reference item 3.2.1.3) recommended that the NRC should inspect plant alarm response procedure requirements for leakage monitoring systems to assess whether they provide adequate guidance for the identification of RCPB leakage. The staff plans to revise the existing guidance in IMC 2515, Appendix D, "Plant Status," to ensure that the NRC verifies that the licensees adequately monitor the RCS leakage detection system instrumentation, in accordance with the plant alarm response procedure requirements.

(9) *Develop inspection guidance to ensure the adequacy of PWR plant boric acid corrosion control programs*

The DBLLTF (reference item 3.2.2.1) recommended that the NRC should inspect the adequacy of boric acid corrosion control programs for pressurized-water reactors (PWRs), including their implementation effectiveness, to determine their acceptability for the identification of boric acid leakage, and their acceptability to ensure that adequate evaluations are performed for identified boric acid leaks. The DBLLTF further recommended that the NRC should develop inspection guidance for the periodic inspection of boric acid corrosion control programs for PWRs (reference item 3.3.2.1), and should develop inspection guidance or revise existing guidance, such as Inspection Procedure (IP) 71111.08, to ensure that the staff periodically reviews vessel head penetration (VHP) nozzles and the reactor pressure vessel (RPV) head area during licensees' inservice inspection (ISI) activities (reference item 3.3.4.3).

To address the DBLLTF concerns, the staff developed temporary instruction (TI) 2515/150, "Reactor Pressure Vessel Head and Vessel Head Penetration Nozzles," which the regions are currently implementing. The staff is also revising baseline inspection procedure IP 71111.08, "Inservice Inspections," to add inspection requirements and guidance for use in reviewing the effectiveness of a licensee's implementation of the boric acid corrosion program on a periodic basis. In addition, the staff will add requirements and guidance for use in inspecting the reactor vessel upper head penetrations/nozzles for potential degradation. The staff will also revise the resource estimate for this procedure to include this additional inspection effort. The staff expects to complete this task in 2004.

(10) *Develop inspection guidance for the verification of the implementation of owners groups' commitments*

The DBLLTF (reference item 3.2.3.2) recommended that the NRC should develop general inspection guidance for periodic verification of the implementation of the commitments that the owners groups make on behalf of their members. The staff is currently evaluating this recommendation, and expects to resolve this issue by December 2004.

(11) *Develop inspection guidance to assess outage work scope and scheduler influences*

The DBLLTF (reference item 3.2.5.1) recommended that the NRC should develop inspection guidance for use in assessing schedular influences on outage work scope. As a result, the staff revised IP 71111.15, "Operability Evaluations," to include deferred modifications in the inspection sampling list in order to assess potential schedular influences on outage work scope and considers this issue closed.

(12) *Develop inspection guidance to assess longstanding unresolved problems*

The DBLLTF (reference item 3.2.5.2) recommended that the NRC should revise its inspection guidance for use in assessing (1) the safety implications of longstanding, unresolved problems; (2) corrective actions that are phased in over several years or refueling outages; and (3) deferred modifications. As a result, the staff revised IP 71152, "Problem Identification and Resolution," to incorporate recommendations made by the PI&R Focus Group to address several items from the DBLLTF. The changes include enhanced requirements regarding the routine PI&R reviews conducted by resident inspectors, biennial reviews of longstanding issues, and biennial reviews of operating experience issues. Therefore, this item is closed.

(13) *Develop inspection guidance to assess repetitive or multiple technical specification action statement entries*

The DBLLTF (reference item 3.3.1.2) recommended that the NRC should develop inspection guidance for use in assessing repetitive or multiple TS action statement entries, as well as the radiation dose implications associated with repetitive tasks. As a result, the staff revised IP 71152, and is currently revising Appendix D to IMC 2515, to provide inspection guidance for use in assessing longstanding issues and repetitive or multiple TS action statement entries, as well as the radiation dose implications associated with repetitive tasks.

(14) *Revise the overall PI&R inspection approach, such that issues similar to those experienced at DBNPS are reviewed and assessed*

The DBLLTF (reference item 3.3.2.2) recommended that the NRC should revise the overall PI&R inspection approach, such that issues similar to those experienced at the Davis-Besse Nuclear Power Station (DBNPS) are reviewed and assessed. The DBLLTF further recommended that the NRC should enhance the guidance for these inspections to prescribe the format of information that is screened when determining which specific problems will be reviewed. As a result, the staff revised IP 71152 to incorporate recommendations made by the PI&R Focus Group to address this item and several other DBLLTF recommendations, and considers this item closed.

(15) *Provide enhanced guidance to pursue issues and problems identified during plant status reviews*

The DBLLTF (reference item 3.3.2.3) recommended that the NRC should provide enhanced inspection guidance for use in pursuing issues and problems identified during plant status reviews. The staff revised IP 71152 to incorporate this item and several other DBLLTF recommendations, and considers this item closed.

(16) *Improve inspection guidance to provide for the longer-term followup of issues that have not progressed to a finding*

The DBLLTF (reference item 3.3.2.4) recommended that the NRC should revise its inspection guidance to provide for the longer-term followup of issues that have not progressed to a finding. The staff revised IP 71152 to incorporate recommendations made by the PI&R Focus Group to address this item and several other DBLLTF recommendations, and considers this item closed.

(17) *Evaluate inspection guidance pertaining to refueling outage activities*

The DBLLTF (reference item 3.3.4.1) recommended that the NRC should review its inspection guidance pertaining to refueling outage activities to determine whether the level of inspection effort and guidance are sufficient, given the typically high level of licensee activity during relatively short outage periods. Accordingly, the staff is currently revising IP 71111.20, “Refueling and Outage Activities,” to clarify the guidance for refueling outage activities to address the DBLLTF concerns.

(18) *Strengthen inspection guidance for reviewing operating experience*

The DBLLTF (reference item 3.3.4.2) recommended that the NRC should strengthen its inspection guidance pertaining to the periodic review of operating experience. The DBLLTF further stated that the level of effort should be changed, as appropriate, to be commensurate with the revised guidance. As a result, the staff is currently reviewing the existing inspection procedures to determine whether a new procedure should be developed or existing procedures revised to provide guidance for the periodic review of operating experience.

(19) *Provide more structured and focused inspections to assess licensee employee concerns programs and safety-conscious work environment*

The DBLLTF (reference item 3.3.4.5) recommended that the NRC should review the range of NRC baseline inspections and plant assessment processes, as well as other NRC programs, to determine whether sufficient programs and processes are in place to identify and appropriately disposition the types of problems experienced at DBNPS. Additionally, the DBLLTF recommended that the NRC should provide more structured and focused inspections to assess licensee employee concerns programs and safety-conscious work environment. This issue is currently under review.

(20) *Reassess the basis for the cancellation of the inspection procedures that were deleted by Change Notice 01-017*

The DBLLTF (reference item 3.3.4.7) recommended that the NRC should reassess the basis for the cancellation of the inspection procedures that were deleted by Change Notice (CN) 01-017 to determine whether any of the deleted inspection procedures have continuing applicability and to reactivate such procedures, as appropriate. Accordingly, the staff is currently reassessing the basis for the cancellation of the inspection procedures that were deleted by CN 01-017. Preliminary evaluation indicates that procedures deleted from IMC 2515, "Light-Water Reactor Inspection Program — Operations Phase," did not negatively impact the ROP.

(21) *Establish program expectations and metrics to satisfy minimum resident inspector staffing levels*

The DBLLTF (reference item 3.3.5.3) recommended that the NRC should establish expectations and metrics for resident inspector staffing, including the establishment of program expectations to satisfy minimum staffing levels. The staff has begun collecting resident inspector staffing data and will establish a baseline for minimum resident inspector staffing. The staff will trend this data and report the results in the annual ROP self assessment paper for CY 2004.

(22) *Revise guidance to include a description of licensee corrective actions in inspection reports, as applicable*

The SDP Task Group (reference item 3.10.3.1) recommended that the staff should revise IMC 0612 to require that the inspection report summary of findings must include a brief description of corrective actions taken by the licensee to restore compliance with NRC regulations, where applicable. OIG recommendation #10 from OIG-02-A-15, "Review of NRC's Significance Determination Process," dated August 21, 2002, provided a similar recommendation. As a result, the staff revised IMC 0612 to require licensee corrective actions to be included in the plant performance summaries (i.e., summary of findings). Accordingly, this item is closed.

(23) *Establish metrics to capture the entire process of identifying and assessing findings*

OIG recommendation #5 from OIG-02-A-15, "Review of NRC's Significance Determination Process," dated August 21, 2002, stated that the staff should establish metrics to capture the entire process of identifying and assessing findings. Several metrics already exist in IMC 0307, "Reactor Oversight Process Self-Assessment

Program," to ensure the accuracy and completeness of inspection findings and their significance. In addition, the staff revised IMC 0307 to state that for findings greater than green, the staff will evaluate any delays or inefficiencies in identifying performance deficiencies and make recommendations to improve inspection effectiveness. As a result, this item is closed.

Significance Determination Process (SDP)

(1) *Validate and issue plant-specific Reactor Safety SDP notebooks, including the Phase 2 worksheets*

The staff accelerated the benchmarking and issuing of the notebooks and completed the task in September 2003. The staff has since issued the revised notebooks and plans to complete a standardization process for the notebooks by the end of 2004. This process will standardize the quality of the benchmarked notebooks, resulting in overall improvement. In addition, as a result of the SDP Task Group recommendation, the staff plans to develop pre-solved SDP tables for use by the inspectors.

(2) *Continue efforts to obtain improved and standardized risk analysis tools for the risk analysts*

As discussed above, the staff continues to improve the Phase 2 notebooks through the benchmarking effort to achieve increased levels of reliability and predictability with results that are understood by all stakeholders. Additionally, the NRC's Office of Nuclear Regulatory Research (RES) has completed the development of all Level 1, Revision 3i, Standardized Plant Analysis Risk (SPAR) models and has coordinated with NRR to schedule onsite quality assurance (QA) reviews during benchmarking visits to develop a more reliable Phase 3 SDP analysis tool for at-power internal events. To date, 60 full power operation SPAR models have received onsite QA reviews. The remaining 12 onsite reviews are scheduled for completion during FY 2004.

(3) *Replace the interim Physical Protection SDP with a revised SDP*

Enhancements to the Physical Protection SDP were deferred while the NRC continued to focus on a number of near- and long-term security issues identified since the terrorist attacks on September 11, 2001. SECY-03-0062 noted that the staff was evaluating the adequacy of the guidance for the Interim Physical Protection SDP to refine and enhance the SDP in light of the current threat environment, potential changes in the design-basis threat, and other considerations. As a result, NSIR developed a new SDP, which is currently under review by internal stakeholders.

(4) *Continue to devise methodologies that will allow inspectors to develop realistic fire scenarios and improve the accuracy of site-specific data, such as fire ignition frequency, used in the assessment of risk associated with fire protection findings.*

The Fire Protection SDP is undergoing a major revision. The technical effort is led by a contractor from Sandia National Laboratories, with significant contributions from the NRC staff, including NRR, RES, and regional specialists. Significant testing of the process is ongoing. The SDP is scheduled for issuance at the end of May 2004. Extensive training of all users is planned for April/May 2004.

(5) *Develop a process to evaluate the risk significance of plant shutdown issues*

The staff's ongoing effort to create a Phase 2 methodology tool will allow the assessment of inspection findings identified during plant shutdown to be done by regional senior reactor analysts (SRAs). This will replace the existing process that must be completed by NRC headquarters-based risk analysts. The staff has also completed the new Shutdown Risk SDP, which is designed for use by the SRAs. Training of the SRAs in the implementation of the SDP is scheduled for April 2004.

(6) *Improve the capability to assess the impact of external events on operating reactor safety-related issues*

Incorporation of risk attributes to external initiators remains a significant challenge, and the NRC has assembled a task group to address the problem. The staff is tracking this effort in the SDP Improvement Plan.

(7) *SDP results should be finalized in a timely fashion and posted to the ROP Web site*

As a result of the briefing on lessons learned from the Davis-Besse reactor vessel head degradation, the Commission issued an SRM (M030204), dated February 12, 2003, that asked the staff to finalize the SDP results in a timely fashion and post them to the ROP Web site. Consistent with that request, the staff finalized the resultant Davis-Besse inspection findings through the appropriate SDPs and posted the results to the ROP Web site in the first quarter of 2003. More generally, the staff continues to improve the timeliness of finalizing SDP results and accurately posting the results to the ROP Web site. This item is considered closed.

(8) *Evaluate and address the recommendations made by the Office of the Inspector General and the SDP Task Group*

The OIG completed an audit of the SDP as documented in OIG-02-A-15, "Review of NRC's Significance Determination Process," dated August 21, 2002. That audit yielded 11 specific recommendations, which the staff incorporated into the SDP Improvement Plan for tracking purposes. The staff has resolved all recommendations as to expectation, tracking, and completion dates, and has fully completed five of the recommendations.

In addition, the NRC formed the SDP Task Group to complete an independent and objective review of the SDP. Of the Task Group's 30 specific recommendations, the staff has fully addressed 21, and has incorporated the remainder in the SDP Improvement Plan for subsequent evaluation based on the established schedule. This general issue is considered closed as the specific recommendations are tracked separately.

(9) *Clarify the ALARA SDP regarding "issues that could or do compromise the licensee's ability to assess dose"*

SECY-03-0062 noted that the staff will continue efforts to clarify the "As Low As Reasonably Achievable" (ALARA) SDP regarding the concept of "issues that could or do compromise the licensee's ability to assess dose." The staff incorporated additional guidance into Appendix C to IMC 0609, "Occupational Radiation Protection SDP," which clarifies the dose assessment expectations, and considers this issue closed.

(10) *Review and evaluate the adequacy of the guidance for the Emergency Preparedness SDP*

SECY-03-0062 noted that the staff will continue to review and evaluate the adequacy of the guidance for the Emergency Preparedness (EP) SDP and (1) incorporate lessons learned and input from inspectors and industry stakeholders; (2) review significance levels and adjust, as appropriate, to align with significance of findings in other cornerstones; and (3) provide a path for white significance for the planning standards of Title 10, Section 50.47(b), of the *Code of Federal Regulations* (10 CFR 50.47(b)). Toward that end, the staff revised Appendix B to IMC 0609, which was issued on March 6, 2003. As part of the revision process, the staff incorporated lessons learned and input from stakeholders, resulting in a review and adjustment of the significance levels. In addition, the staff revised the EP SDP such that the risk-significant planning standards in 10 CFR 50.47(b)(4), (5), (9) and (10) included a degraded function section leading to a finding of white significance. Training on the revision was provided to all EP regional inspectors prior to the issuance of the revised SDP, and customized training on the use of the document was provided to resident inspectors. Therefore, this item is closed.

Assessment Program

(1) *Evaluate increasing the threshold for a degraded cornerstone from two to three white performance indicators or inspection findings*

In an SRM dated June 10, 2003 (M030515), the Commission noted that the staff should evaluate stakeholder comments at the briefing on May 15, 2003, as they related to increasing the threshold for a degraded cornerstone from two to three white PIs or inspection findings. On August 29, 2003, the staff issued a memorandum to the Commission to address these issues.

As documented in the Commission memorandum, the staff does not support changing the existing threshold from two white inputs to three white inputs for the following reasons:

- A detailed staff review of plants that have entered the degraded cornerstone column or multiple/repetitive degraded cornerstone column of the Action Matrix since the inception of the ROP revealed that the respective columns of the Action Matrix were the appropriate action level for all 11 plants analyzed.
- The SDP Task Group concluded that the current threshold of two white inputs in the same cornerstone as the criterion for a degraded cornerstone was reasonable, and there was no information to suggest that it was inappropriate.
- The staff is currently reviewing the green/white thresholds for the individual SDPs and PIs in response to a variety of stakeholder concerns, and these threshold questions should be fully resolved before any changes are made to the entry conditions for the Action Matrix.

Accordingly, this issue is considered closed.

(2) *Inform the Commission of the actions planned to respond to the issues raised at the May 15, 2003 Commission briefing*

In an SRM dated June 10, 2003 (M030515), the Commission noted that the staff should inform the Commission of the actions planned to respond to the issues raised by Mr. Riccio in his statement document dated May 15, 2003. The Commission further noted that the staff should follow the established process for evaluating stakeholder comments to evaluate the ROP changes suggested at the meeting. On August 29, 2003, the staff issued a memorandum to the Commission to address these issues, noting that the staff actively solicits and continuously evaluates feedback from both internal and external stakeholders throughout the year and incorporates appropriate changes. Feedback mechanisms include the NRC's internal feedback process, monthly ROP public meetings with the industry, and internal and external surveys. Accordingly, the comments by Mr. McGaha and Mr. Riccio at the Commission meeting on May 15, 2003, have been included in the feedback disposition process. The staff has also included the more significant comments in this Commission paper, including the need to improve PI and SDP effectiveness and to evaluate increasing the threshold for a degraded cornerstone in the ROP Action Matrix from two to three white inputs. This issue is also considered closed.

(3) *Consider providing flexibility in conducting annual ROP public meetings*

In an SRM dated June 10, 2003 (M030515), the Commission noted that it supports flexibility in conducting effective ROP public meetings, including giving consideration to measures such as providing NRC personnel who are knowledgeable in areas of interest on the national level and allowing the resident inspectors to conduct ROP meetings held at the plant sites, as appropriate. In addition, the Efficiency Focus Group recommended that the staff should explore less resource-intensive alternatives to the annual performance assessment meeting for plants in the licensee response column of the Action Matrix.

On January 29, 2004, the staff revised IMC 0305,"Operating Reactor Assessment Program," to give the regional offices increased flexibility in scheduling annual public meetings. Previous guidance stated that the annual public meetings should be scheduled within 16 weeks of the end of the assessment period. This requirement was independent of the Action Matrix column that the plant was in. The staff has reassessed this requirement and has determined that flexibility in scheduling some of the public meetings is warranted. Therefore, plants that have been in the licensee response or regulatory response columns of the Action Matrix for the entire assessment period may schedule their annual public meeting up to 6 months after issuing the annual assessment letter. Accordingly, this issue is closed.

(4) *Determine whether a graded approach for removing inspection findings from consideration in the Action Matrix is appropriate*

The industry has recommended a graded approach for removing inspection findings from consideration in the assessment program. This recommendation involves applying a graded approach based on safety significance, such that white findings would remain in the assessment program for two quarters, yellow findings for three quarters, and red

findings for four quarters. This approach would only apply to those findings where corrective actions were deemed appropriate.

The range of actions across the Action Matrix are graded such that increased regulatory actions occur with the accumulation of "greater than green" assessment inputs. One concern with the industry's recommendation is that inspection findings would not remain in the assessment program long enough to accumulate in the Action Matrix and allow increased NRC action with degrading performance, as envisioned during the development of the ROP. The staff does not plan to expend dedicated resources on further evaluation of the industry's recommendation and considers this issue closed. However, the staff will continue to review the Action Matrix annually, as part of the self-assessment and the Agency Action Review Meeting (AARM), to assess the appropriateness of the criteria for determining a licensee's placement in the Action Matrix.

(5) *Develop guidance to address the impacts of IMC 0350 implementation on the regional organizational alignment and resource allocation*

The DBLLTF (reference item 3.3.5.4) recommended that the NRC should develop guidance to address the impacts of implementing IMC 0350, "Oversight of Operating Reactor Facilities in a Shutdown Condition with Performance Problems," as they relate to regional organizational alignment and resource allocation. As a result, the staff made significant changes to the IMC 0350 guidance to provide a comprehensive correlation between aspects of the ROP and the IMC 0350 plants, and to incorporate other lessons learned and clarifications. In addition, the staff revised the inspection budget estimates to include resources for overseeing the IMC 0350 plants. Therefore, this item is closed.

(6) *Revise the oversight process to permit implementation of IMC 0350 without first having established that a significant performance problem exists.*

The DBLLTF (reference item 3.3.5.4) recommended that the NRC should revise IMC 0350 to permit implementation of IMC 0350 without first having established that a significant performance problem exists, as defined by the ROP. Accordingly, the staff revised IMC 0350 to include an entry condition based on a significant operational event, as defined in Management Directive (MD) 8.3, "NRC Incident Investigation Program," without first having established that a significant performance problem exists. This item is also closed.

(7) *Provide a more predictable standard/criterion for determining what constitutes a substantive cross-cutting issue*

The SDP Task Group (reference item 3.8.3.2) recommended that the program office should provide a more predictable standard or criterion for determining what constitutes a substantive cross-cutting issue to ensure consistency across the regions.

The program office participates in each of the plant-specific mid-cycle and end-of-cycle review meetings for each region. In preparation for these meetings, the regional office develops a detailed plant performance summary, which includes a discussion of inspection findings with cross-cutting elements. The regions and the program office compare these findings with cross-cutting elements against the criteria for a substantive cross-cutting issue as discussed in IMC 0305. Additionally, plants that are determined

to have substantive cross-cutting issues are discussed at the subsequent end-of-cycle (EOC) summary meeting. The Director of NRR presides over the EOC summary meeting while each regional administrator leads the discussion for his or her regional office. This meeting provides an additional level of awareness concerning those plants that will have a substantive cross-cutting issue in their assessment letter. The program office has revised the guidance regarding substantive cross-cutting issues in each revision of IMC 0305 in order to incorporate lessons learned from implementation during the previous mid-cycle or end-of-cycle review meeting. The staff plans to continue monitoring regional implementation of this guidance and making adjustments, as necessary.

(8) *Revise the ROP guidance to include consideration of a response to the identification of a substantive cross-cutting issue and a description of how the NRC will close a substantive cross-cutting issue*

The SDP Task Group (reference item 3.8.3.3) recommended that the program office should revise the ROP guidance to include consideration of a licensee response to the identification of a substantive cross-cutting issue (only when there is at least one white PI or finding). The Task Group noted that the response could include a redirection of inspection resources, management meetings, and/or a docketed licensee response describing actions planned or taken to address the cross-cutting issue. The Task Group further noted that this guidance should also include a description of how the NRC will close a substantive cross-cutting issue.

The latest revision to IMC 0305, dated January 29, 2004, incorporates this SDP Task Group recommendation. Specifically, the revision to IMC 0305 provides requirements for plants that have previously had a substantive cross-cutting issue in their mid-cycle or annual assessment letter. The regional office will evaluate the current 12 months of inspection findings with cross-cutting elements against the original criteria. The next mid-cycle or annual assessment letter will either state that the issue has been resolved or summarize the agency's assessment against specific criteria, as well as summarizing the licensee's progress in addressing the issue.

Additionally, the regional office may consider several options for those plants where a substantive cross-cutting issue has been raised in at least two consecutive assessment letters. These options include requesting (1) that the licensee provide a response at the next annual public meeting, (2) that the licensee provide a written response to the substantive cross-cutting issues raised in the assessment letters, or (3) a separate meeting be held with the licensee. This item is considered clsoed.

(9) *Provide more guidance as to the type of information that should be included in a region's request to deviate from the Action Matrix*

The SDP Task Group (reference item 3.8.3.4) recommended that the staff should supplement the guidance in IMC 0305, Section 06.06.f, with additional guidance that lists the types of information that should be included in a region's request to deviate from the Action Matrix (e.g., synopsis of the findings affecting the licensee's performance, the actions (column) stipulated by the Action Matrix, the Region's rationale or considerations for taking action different from that stipulated in the Action Matrix).

The latest revision to IMC 0305, dated January 29, 2004, incorporates this SDP Task Group recommendation. Specifically, the revision to IMC 0305 requires that letters requesting Action Matrix deviations must include a synopsis of the licensee performance deficiencies, the required NRC actions (per the Action Matrix) for these inputs, the proposed alternative actions, and the region's rationale for requesting the deviation. Accordingly, this item is closed.

(10) *Monitor the effectiveness of the guidance for removing plants from the multiple/repetitive degraded cornerstone column of the Action Matrix*

SECY-03-0062 noted that the revision of IMC 0305, dated February 19, 2003, added guidance for removing plants from the multiple/repetitive degraded cornerstone column of the Action Matrix, and that the staff should monitor the effectiveness of this recent change and make adjustments to the guidance, as necessary. The staff developed this guidance as a result of lessons learned from Indian Point Station, Unit 2, exiting the multiple/repetitive degraded cornerstone column of the Action Matrix. Since the implementation of this guidance, no plants have utilized this revised guidance. However, Cooper Nuclear Station and Point Beach Nuclear Plant are currently in the multiple/repetitive degraded cornerstone column of the Action Matrix, and the staff will incorporate lessons learned from those plants into the next revision of IMC 0305.

(11) *Review the policy for issuing press releases for ROP findings*

The SDP Task Force (reference items 3.9.3.5 and 3.9.3.6) recommended that OPA should modify its policy for issuing press releases concerning ROP findings to link the issuance of a press release to findings that result in a degraded cornerstone. Additionally, the Task Force recommended that the staff should modify IMC 0305 to reference the OPA policy for issuing press releases for ROP inspection findings.

OPA has recently revised its guidance, such that a press release is not issued for a single white inspection finding or PI, unless there is a meeting on the finding or there is significant media interest in the plant. However, a press release is issued for a second white finding or PI, regardless of whether it results in a degraded cornerstone. OPA does not anticipate changing this guidance in the near future. Additionally, IMC 0305 does not, and should not, dictate OPA policy on issuing press releases for ROP inspection findings. This policy decision should remain with the originating office, and this item is closed.

(12) *Review the action matrix thresholds to determine if changes are needed to ensure that the Action Matrix categorization adequately reflects plant performance*

In an SRM dated June 10, 2003 (M030515), the Commission noted that the staff should review the Action Matrix thresholds to determine whether changes are needed to ensure that the Action Matrix categorization adequately reflects the safety significance of PIs and inspection findings. In addition, the SDP Task Group (reference item 3.11.3.3.1) previously recommended that NRR should review the Action Matrix on an annual basis to assess its impact on stakeholders and the appropriateness of the criteria for determining the combination of inputs that dictate a licensee's placement in the Action Matrix. The results of this assessment should be provided in a report to management with recommendations for adjustments, as necessary.

The staff provides the Commission with an annual ROP self-assessment, which includes the ROP assessment program. The self-assessment periodically reviews the effectiveness of the ROP assessment program via a variety of mediums including the metrics program and internal and external feedback mechanisms. Additionally, senior NRC managers review the ROP self-assessment at the Agency Action Review Meeting (AARM).

The staff will continue these efforts and report the results to the Commission. Additionally, as discussed in issue (1) concerning the assessment program (above), the staff recently reviewed the Action Matrix thresholds for entering the degraded cornerstone column of the Action Matrix and found that the current threshold is appropriate. Therefore, this issue is closed.

(13) *Identify alternative mechanisms to independently assess plant performance*

The DBLLTF (reference item 3.3.3.1) recommended that the staff should identify alternative mechanisms to independently assess plant performance as a means of self-assessing NRC processes. Once identified, the feasibility of such mechanisms should be determined. The staff is still developing the scope of this project, and will report the results of this effort in the next annual self-assessment paper to the Commission.

(14) *Perform a sample review of the plant assessments conducted under the interim PPR assessment process*

The DBLLTF (reference item 3.3.3.2) recommended that the staff should perform a sample review of the plant assessments conducted under the interim plant performance review (PPR) assessment process (1998–2000) to determine whether any plant safety issues have not been adequately assessed. The staff is still developing the scope of this project, and will report the status of this effort in the next annual self-assessment paper to the Commission.

Communication Activities and Other Program Issues

(1) *Provide recommendations for resolving, in a transparent manner, apparent conflicts and discrepancies between aspects of the ROP that are risk-informed and those that are performance-based*

In an SRM dated December 20, 2001, the Commission requested the staff to provide recommendations, with ACRS input, for resolving, in a transparent manner, apparent conflicts and discrepancies between aspects of the revised reactor oversight process that are risk-informed (e.g., SDP) and those that are performance-based (e.g.,PIs). The staff has met and corresponded with the ACRS on several occasions to address their specific concerns regarding the ROP.

The staff last briefed the ACRS regarding their concerns with the ROP on March 6, 2003. Following that briefing, the ACRS forwarded a letter to the Commission on March 13, 2003, concluding that disagreements still exist between the staff and the ACRS. The staff responded to that letter on April 29, 2003, agreeing that the ACRS concerns warrant further consideration and will continue to be evaluated as part of the ongoing self-assessment process (reference ADAMS Accession No. ML030980658).

The staff noted that the specific issues presented in the ACRS letter of March 13, 2003, will serve as the basis for further discussion with the Committee and potential revisions to the ROP. This paper discusses several of the ACRS concerns. At this time, the staff has not planned any additional meetings or correspondence with the ACRS, and considers this general issue closed. However, some of the specific concerns remain open and are being tracked separately.

(2) *Conduct an independent survey by a qualified contractor of the impact of the NRC's activities on reactor licensees' operations*

In an SRM dated January 30, 2002, the Commission approved the proposal to have a qualified contractor conduct an independent survey of the impact of the NRC's activities on reactor licensees' operations. The survey was initially postponed to redirect applicable staff to support NSIR. The survey is currently receiving a final review by the Office of Management and Budget and will be issued shortly. The staff plans to report the results to the Commission following completion of the survey.

(3) *Evaluate the need and feasibility for a public workshop*

SECY-03-0062 noted that the staff would evaluate the need for and feasibility of a public workshop in CY 2003 to address several common concerns noted by both internal and external stakeholders. The staff considered sponsoring a separate ROP-specific workshop in 2003, but elected not to do so based on competing priorities and insufficient resources. However, the staff did include a specific question in the external survey in November 2003 to ascertain whether an ROP workshop would be beneficial. While most respondents did not directly address this question, those who did noted that there would be some potential interest and benefit. The staff recently sponsored a specific session at the Regulatory Information Conference in 2004 to discuss ongoing ROP issues as it has the past several years, will continue to conduct monthly ROP public meetings, and will evaluate the need and feasibility for a separate ROP-specific workshop in CY 2005.

(4) *Highlight the changes made to the ROP as a result of the Davis-Besse Lessons Learned Task Force recommendations*

SECY-03-0062 noted that the significant changes made to the ROP as a result of the DBLLTF recommendations would be highlighted in the next annual self-assessment. As a result of the DBLLTF recommendations, the staff has made several changes to the ROP, as discussed throughout this paper. The relevant program area discussions in Attachment 1 and the status of previous issues in this attachment provide additional details regarding specific DBLLTF recommendations. In addition, Attachment 5 to this paper includes a more general discussion concerning the status of the DBLLTF recommendations. Therefore, this general issue is considered closed as the specific recommendations are tracked separately within the relevant program areas.

(5) *Conduct training to reinforce expectations regarding inspection insights gained from the Davis-Besse incident*

The DBLLTF (reference item 3.3.1.1) recommended that the NRC should provide training for NRC managers and staff to reinforce expectations related to (1) maintaining a questioning attitude in conducting inspection activities; (2) developing inspection

insights stemming from the event at DBNPS, as they relate to symptoms and indications of RCS leakage; (3) communicating expectations regarding the inspection followup of the types of problems that occurred at DBNPS; and (4) maintaining an awareness of surroundings while conducting inspections.

The staff developed and provided Web-based “read-and-sign” training for the regional staff to emphasize inspection insights gained from the Davis-Besse incident. Specifically, the staff implemented three read-and-sign training modules in 2003 to specifically address the DBLLTF recommendations. One module concerned the effects of boric acid corrosion, another was associated with the changes made to IP 71152, and the third dealt with the importance of maintaining a questioning attitude toward safety (using the Columbia Space Shuttle accident as a vehicle for reinforcing this message). As a result, this item is closed.

(6) *Provide ROP refresher training to managers and staff members*

The DBLLTF (reference item 3.3.4.6) recommended that the NRC should provide ROP refresher training to managers and staff members. During CY 2003, the Management Steering Group for IMC 1245, “Inspector Qualification Program for the Office of Nuclear Reactor Regulation Inspection Program,” generated topics to be included in the ROP refresher training. The staff is currently developing the training and expects to complete that task by the end of CY 2004.

(7) *Conduct training to enhance inspectors’ knowledge of boric acid corrosion and primary water stress-corrosion cracking*

The DBLLTF (reference item 3.3.5.1) recommended that the NRC should maintain its expertise in the subject areas by ensuring that inspector training includes (1) boric acid corrosion effects and control, and (2) primary water stress-corrosion cracking (PWSCC) of nickel-based alloy nozzles. In response, the staff developed and implemented training to familiarize the regional inspectors with the NRC’s current understanding of and approach to monitoring boric acid corrosion and PWSCC. The Web-based training stressed that previous assumptions that RCS leakage onto a hot surface would boil off and not cause corrosion may not be correct. The NRC now recognizes that previous assumptions did not represent the total range of situations under which boric acid corrosion could occur, so the training was intended to emphasize that boric acid could be much more active than was assumed in the past. Therefore, this item is also closed.

(8) *Reinforce expectations regarding regional manager site visits*

The DBLLTF (reference item 3.3.5.2) recommended that the NRC should reinforce the expectations of IMC 0102, "Oversight and Objectivity of Inspectors and Examiners at Reactor Facilities," as they relate to regional managers’ visits to reactor sites. At the Division Directors Counterpart meeting at NRC headquarters in July 2003, the agency provided training to the regional division directors regarding the expectations of IMC 0102. This training session included discussions among the division directors led by the IMC 1245 training coordinator. This item is therefore closed.

(9) *Analyze the CY 2002 internal survey written comments on the ROP*

During CY 2003, the staff initiated and completed an analysis of the individual written comments received in response to the CY 2002 internal ROP survey. On the basis of that analysis, the staff made 10 recommendations based on the repetitive themes and immediately implemented 7 of those recommendations, including not issuing inspection procedures without first providing appropriate training and adopting 10 expectations regarding the presentation of procedure content. The staff further initiated six feedback forms on four inspection manual chapters and inspection procedures, and subsequently closed four of those six feedback forms by the end of CY 2003. This item is considered closed.

(10) *Continue to maintain the accuracy of the information on the internal ROP Web site and make refinements to improve the site's effectiveness*

SECY-03-0062 noted that the staff had not adequately maintained the internal ROP Web page early in 2002 and that internal stakeholders had lost confidence in the site as a reliable source of ROP information. The staff updated the Web page in late 2002 and has since maintained the site as an effective and efficient communication tool. In addition, during CY 2003, the staff completely redesigned and reconstructed the internal ROP Web page to better meet the needs of internal stakeholders and provide maximum flexibility as a communication tool. The Web page now has an entirely different format, which allows the main page to act as a hub to the various types of information available. This item is considered closed; however, the staff plans to continue to develop new methods and enhance existing assets to further maximize the potential and effectiveness of the internal ROP Web page.

(11) *Provide a link from the findings summary Web pages to documents that support any changes from preliminary inspection report significance determinations*

OIG recommendation #7 from OIG-02-A-15, "Review of NRC's Significance Determination Process," dated August 21, 2002, stated that the staff should revise the ROP Web page to provide a link from the findings summary pages to documents that support any changes from preliminary inspection report significance determinations. IMC 0306, "Information Technology Support for the Reactor Oversight Process," now requires that all reports and letters must have a unique report number and be associated with any and all findings discussed within the report or letter. This requirement allows the Web page to display links to all reports or letters affecting each individual finding on the ROP Web page summary of findings. The staff is monitoring compliance with this new requirement.

(12) *Provide complete access to inspection report results from the Web site*

OIG recommendation #8 from OIG-02-A-15, "Review of NRC's Significance Determination Process," dated August 21, 2002, stated that the staff should expand the ROP Web page to provide complete access to inspection report results, rather than only those that identify operational deficiencies. The ROP Web pages include performance summary pages for each reactor plant. Those summary pages provide access to each inspection report issued since initial implementation of the ROP (April 2000) without regard to the significance of the documented inspection findings. The user has the

ability to access plant-specific inspection report details and assessment process results for each reactor plant. This item is considered closed.

(13) *Expand the Web site to display all significant finding colors in a cornerstone*

OIG recommendation #9 from OIG-02-A-15, "Review of NRC's Significance Determination Process," dated August 21, 2002, stated that the staff should expand the ROP Web page to display all significant finding colors in a cornerstone. A complete listing of plant performance information (i.e., inspection findings and PIs) is available to all stakeholders on the ROP Web pages. Site-specific performance deficiencies, sorted by the seven cornerstones of safety, are summarized for each plant. Stakeholders have access to plant inspection results, PI data, NRC assessment letters, and inspection report details. Users also have ready access to all findings in a cornerstone by hyperlinking to the next Web page, and the OIG's recommendation would not substantially improve the quality of the information available to users. The SDP Task Group agreed that the difficulty and costs of implementing this change appears to exceed its benefit. This item is closed, as the OIG agreed that the staff's approach met the intent of the recommendation.

(14) *Revise the Web site to fully describe licensee corrective action related to each finding*

OIG recommendation #10 from OIG-02-A-15, "Review of NRC's Significance Determination Process," dated August 21, 2002, stated that the staff should revise the ROP Web page to fully describe licensee corrective actions related to each finding. The staff acknowledged that information related to licensee actions to correct immediate safety concerns should be easily identified in the inspection finding summaries. To accommodate this recommendation, NRR has revised IMC 0612 to require that licensee actions to correct significant safety findings must be included in the inspection report summary of findings and the individual plant performance summaries available on the ROP Web page. Therefore, this item is closed.

(15) *Ensure the accuracy of the findings on the ROP Web page*

SECY-03-0062 noted that the staff had initiated and implemented a new internal process to further ensure the accuracy of the findings on the ROP Web page, which will be included in IMC 0306, "Information Technology Support for the Reactor Oversight Process." With the issuance of IMC 0306, the staff created a formal review and submission process to ensure the accuracy of the information posted on the ROP Web page. The process requires a review of assessment information by regional branch chiefs, and subsequent submission of assessment inputs on a quarterly basis or when inspection findings or PIs cross a threshold mid-quarter. Those inputs are then reviewed by the staff of the Inspection Program Branch (IIPB) in the NRR Division of Inspection Program Management to ensure the accuracy of available information and correctness within the ROP. After verifying all information and assessments internally, the staff posts the information to the NRC's external Web site. Since the implementation of this process, no errors have occurred in posting information to the ROP assessment Web pages. Therefore, this issue is closed.

(16) *Continue to make enhancements to the ROP feedback process*

SECY-03-0062 noted that the staff would continue to enhance the ROP feedback process based on ongoing concerns and plans to evaluate a reengineering of this process to improve its efficiency and effectiveness in addressing internal stakeholder feedback. SECY-03-0062 further noted that an interactive database was scheduled for development in FY 2003 to give internal stakeholders access to the feedback database to view open and closed feedback forms. The ROP feedback process continues to provide a useful means for staff to identify concerns or issues and to recommend improvements to ROP policies, procedures, or guidance. Feedback timeliness has improved significantly and, unlike previous years, regional staff appear to be satisfied with the feedback process response time based on a recent poll of regional feedback coordinators. The enhancements to the feedback process scheduled in 2003 were delayed and are expected to be made in 2004.

(17) *Develop an electronic support system for inspectors to help inspectors perform their jobs more efficiently*

SECY-03-0062 noted that the staff plans to develop an electronic support system to help inspectors perform their jobs more efficiently by providing a knowledge transfer tool in an inspector-centric, usable format. The Inspector Electronic Support System (IESS) is currently under development and will transfer knowledge to enhance the efficiency of inspection preparation. Some of the components of the electronic system are an inspector community bulletin board, industry lessons learned, operating experience tailored for inspection procedures, and sources of technical information. One of the first elements of the IESS to be implemented was the electronic inspector newsletter, which was issued bimonthly in 2003 and received extremely positive feedback from inspectors.

(18) *Determine the feasibility of using information technology tools to increase inspector productivity*

SECY-03-0062 noted that the staff was conducting cost and budget evaluations to determine the feasibility of using personal digital assistants (PDAs) and pen scanners to increase inspector productivity. Pilots conducted using the PDAs and pen scanners clearly demonstrated the usefulness of these tools for inspectors. The program office has recommended that regions utilize a “cafeteria style” approach in providing these tools to inspectors (i.e., give tools to inspectors who request them, rather then force fitting the tools to all inspectors). Regions are required to request funding through the budget process for information technology tools to support inspectors. NRR will continue to take the lead in developing pilots that may be of benefit to inspectors.